## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	) )
v.	) Criminal No. 21-10104-PBS
VLADISLAV KLYUSHIN, a/k/a "Vladislav Kliushin"	) )
IVAN ERMAKOV, a/k/a "Ivan Yermakov", and	)
NIKOLAI RUMIANTCEV,	)
a/k/a "Nikolay Rumyantcev"	)
Defendants.	) ) )

## **STIPULATION**

The parties hereby stipulate and agree that defendant Vladislav Klyushin was arrested in Sion, Switzerland on March 21, 2021 at approximately 13:30 local time, which was 12:30 UTC time. This stipulation is admissible evidence.

## Respectfully submitted,

VLADISLAV KLYUSHIN Defendant	RACHAEL S. ROLLINS United States Attorney
By: /s Maksim Nemtsev  MAKSIM NEMTSEV  MARC FERNICH  Counsel for Defendant	/s/ Stephen E. Frank STEPHEN E. FRANK SETH B. KOSTO Assistant United States Attorneys
January 16, 2023	